

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Criminal No.

CR 21-252 PJS/JFD

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2
)	18 U.S.C. § 922(g)(1)
v.)	18 U.S.C. § 924(e)
)	18 U.S.C. § 1951
CORNELIUS GRAHAM,)	
)	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery)

On or about September 28, 2021, in the State and District of Minnesota, the defendant,

CORNELIUS GRAHAM,

aiding and abetting and being aided and abetted by another, did knowingly and unlawfully attempt and conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in such commerce by robbery, in that the defendant did unlawfully and knowingly take and obtain cash which was the property of Menards, located in West St. Paul, Minnesota, a commercial business then engaged in and affecting interstate commerce, in the presence of a victim employee, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person, all in violation of Title 18, United States Code, Sections 2 and 1951.

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COUNT 2

(Felon in Possession of a Firearm – Armed Career Criminal)

On or about September 28, 2021, in the State and District of Minnesota, the defendant,

CORNELIUS GRAHAM,

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, and at least three of which were violent felonies committed on occasions different from one another, namely,

OFFENSE	JURISDICTION OF CONVICTION	DATE OF CONVICTION (on or about)
Bank Robbery	District of Kansas	2000
Interference With Commerce by Robbery	District of Kansas	2000
Interference With Commerce by Robbery	District of Kansas	2000

and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Ruger, Model LCR, .357 caliber, pistol, bearing serial number 54607914, and did so knowingly, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18,

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United States Code, Sections 924(d)(1) and 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c).

Upon conviction of Count 1 of this Indictment, the defendant,

CORNELIUS GRAHAM,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Sections 2 and 1951.

of either Count 1 or Count 2 of this Indictment, the defendant,

CORNELIUS GRAHAM,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms, ammunition, and accessories involved in or used in the commission of Counts 1 or 2, including but not limited to a Ruger, Model LCR, .357 caliber pistol, bearing serial number 54607914, and any ammunition seized therewith.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON